

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
) Case No. 16-20259-gmh
IGNACIO MENDIOLA,) Chapter 13
)
Debtor.)

MOTION TO CONTINUE THE AUTOMATIC STAY

Now comes the debtor, Ignacio Mendiola, by his attorneys, Nickolai & Poletti, LLC, by Anton B. Nickolai, and hereby moves the court for the entry of an order continuing the automatic stay pursuant to §362(c)(3)(B) of the Bankruptcy Code, and in support of this motion, alleges and states as follows:

1. The debtor, Ignacio Mendiola, has been an individual in a case under Chapter 13 which was pending within the one (1) year preceding the filing of the above-captioned case.
2. There has been a substantial change in the personal and financial affairs of the debtor since the dismissal of his last Chapter 13 case.
3. Specifically, the debtor was forced to leave the country for a significant period of time during his last case to travel to Mexico and settle his late father's estate. This led to missed plan payments and, ultimately, the dismissal of his case.
4. As of the filing of the above-captioned case, the estate of the debtor's late father is closed, and the debtor is back home and working and able to make payments in this case.
5. Wherefore, the debtor respectfully requests that the court enter an order continuing the automatic stay.

Dated: January 15, 2016.

Nickolai & Poletti, LLC
Attorneys for Debtor

Drafted By:
Anton B. Nickolai
State Bar No. 1060676
Nickolai & Poletti, LLC
308 Milwaukee Avenue
Burlington, WI 53105
Telephone: (262) 757-8444
Facsimile: (262) 287-9725
Email: anton@nickolailaw.com

/s/ Anton B. Nickolai
By: Anton B. Nickolai
State Bar No. 1060676